REMARKS

In the Office Action mailed October 19, 2005, claims 18 and 19 were objected to because of a typographical error; claims 1-30 were rejected under 35 U.S.C. §103 as being unpatentable over Campbell, Braithwaite, Kataoka and/or Takayama. In the present Response, claims 18 and 19 have been amended to address the informalities, claims 4, 5, 10, 18, 26 and 29 have been cancelled, claims 1, 3, 6-9, 11-15, 17, 24, 25, 27, 28 and 30 have been amended and claims 31-37 have been added; claims 2 and 20-23 remain unchanged. The following remarks are made in the same order as the claims were discussed in the Office Action.

Claim 1 has been amended to incorporate the elements of claim 4, which has been cancelled. The Applicant respectfully disagrees with the rejection of claim 4 since neither Campbell nor Braithwaite disclose a cartridge memory, much less modifying a field in a cartridge memory to render data on the cartridge inaccessible. In the comments made with respect to claim 4, the Examiner asserted that "the storage medium ... [is] a disk cartridge" (pg. 4), thereby equating the recited cartridge memory with the storage medium. However, as discussed in the specification, the storage medium is clearly distinguishable from the cartridge memory. Fig. 6B illustrates "an example of a tape cartridge 600 with a cartridge memory 610 ... and media 612" (¶ 45). Moreover, claims 4 and 5, now cancelled, separately claimed that the predetermined data field could be located in a cartridge memory (claim 4) or on the media (claim 5). Under the principal of claim differentiation, the storage medium and cartridge memory are, therefore, different elements and should not be equated. Additionally, neither Campbell nor Braithwaite teach or even suggest making a combination, mush less one which would produce the claimed invention. Consequently, the cited references do not disclose all of the elements of claim 1, as amended, and do not render the claim obvious.

Claim 3 recites that the processor is further programmed to direct the data storage drive to apply a correction to the data read from the data field to allow data to be read from the storage medium. Thus, the contents of the modified data field in the

cartridge memory are left unchanged but the contents are read by a drive and a correction applied (as described in the specification, ¶¶46, 48). In contrast, the system of Braithwaite changes the state of a flag on the storage medium to indicate the level of protection for the medium. Consequently, the cited references do not disclose all of the elements of claim 3 nor do they suggest a combination.

With respect to claim 8, which recites that the cartridge memory interface is integrated with the storage drive, because neither Campbell nor Braithwaite disclose the use of a cartridge memory, neither disclose a cartridge memory interface. Consequently, their combination does not teach or suggest the elements of claim 8.

The library of Claim 11, as amended, includes an export station and recites that the processor is further programmed with instructions to require a correct password before a cartridge is removed from the library through the export station (¶48, pg. 15). Neither Campbell nor Braithwaite teach removing a cartridge from a library, neither teach an export station, and therefore neither teach requiring a correct password before a cartridge is removed from a library through an export station.

With respect to claim 12, as noted above with respect to amended claim 1, neither Campbell nor Braithwaite teach the use of a cartridge memory (as described in the specification) for any purpose much less modifying the contents of a cartridge memory to render data on the storage medium inaccessible. Therefore, claim 12 is not obvious in light of any combination.

As per the comments made above with respect to the non-obviousness of claim 2, amended claim 15 is non-obvious.

Similarly, claim 17 is not obvious for the reasons stated with respect to claim 3.

The claims which are dependent from claim 1 are non-obvious for the reasons stated and based upon the non-obviousness of the base claim. Additionally, because neither Campbell nor Braithwaite include any suggestion to combine, they are improperly combined and cannot, therefore, render the claims, including claim 1, obvious.

With respect to claim 6, the Examiner equates logical libraries with physical libraries. As is well known in the art, the two are not the same, are not functionally equivalent and serve different purposes. A logical library is a portion of a physical

none disclose multiple libraries, either logical or physical, and none disclose restricting a cartridge to a specified one of the multiple libraries.

The comments made above with respect to claim 3 (pertaining to applying a correction) applies equally to claim 25.

With respect to claims 26-28, since neither Campbell nor Braithwaite disclose using a cartridge memory, neither teaches storing the predetermined data field on a cartridge memory. Moreover, the Applicant disagrees with the Examiner's very broad construction of the word "associated" in claim 28 (the cartridge memory interface is "associated" with the accessor), particularly in view of claim 27 in which the cartridge memory interface is "associated" with the storage drive. Thus, under the principle of claim differentiation, the two claims must be read to cover different aspects of the invention, not the same. However, in order to eliminate this interpretation as an issue, claims 27 and 28 were amended to make clear that the cartridge memory interface is "integrated" with the drive (claim 27) and accessor (claim 28).

The comments made above with respect to claims 22 and 23 (pertaining to multiple libraries) applies equally to claim 30.

New claims 31-37 have been added and recite elements not disclosed in any of the cited references, namely: corrupting the data field in the cartridge memory and removing the corruption to restore access; and writing an invalid media generation to the data field in the cartridge memory and writing the correct media generation to restore access. No new matter has been added.

The Applicant also respectfully disagrees with the statement, repeated several times in the Office Action, that it would be obvious to combine the cited references because they "form the same field of endeavor". There must be some teaching or suggestion in the references to form the combination, or at least the Examiner must provide more clearly and specifically stated grounds for combining. The generic reason provided in the Office Action is not sufficient and for this reason, if no other, the cited references do not render the claims obvious.

library which is partitioned to operate separate from the balance of the physical library (which may be partitioned into additional logical libraries). Logical libraries may (but do not necessarily) run under different operating systems, may be assigned different storage drives, and/or may contain data for different customers, but they are share the same physical library. Physical libraries may be located in different geographic locations, may provide redundant storage and/or may be used to increase the amount of physical storage capacity The Applicant respectfully disagrees with the statement that "it is obvious that logical libraries can be used to achieve the same purpose" as physical libraries. Additionally, the Applicant disagrees with the Examiner equating the claimed logical library with a terminal as disclosed in Kataoka because both are devices: a library is a data storage device while a terminal is an input/output device. The Applicant would also like to point out that the data stored in Kataoka is encrypted which prevents the data from being read. In contrast, the present invention as claimed in claim 6 does not rely on encryption to secure the data on the media and does not modify the media data itself. Rather, a field in the cartridge memory is modified and when access to the data is permitted, the data on the media is read without needing to be decrypted. Consequently, the combination of Campbell, Braithwaite and Kataoka does not render claim 6 obvious.

The discussion in the previous paragraph with respect to Kataoka applies as well to claim 7.

With respect to claim 21, contrary to the Office Action, Kataoka does not teach or suggest a cartridge memory and therefore does not disclose an identifier stored in a cartridge memory as claimed. Moreover, the claimed identifier identifies a library. Thus, in accordance with the present invention, a cartridge may be accessed only by the identified library. In contrast, the identifier taught in Kataoka identifies the cartridge (not the library) and can be accessed by any library which is told to accept the cartridge. The Applicant also again disagrees with the statement equating a library with a terminal.

With respect to claims 22 and 23, the Applicant again disagrees with the attempt to equate the terminals of Kataoka with the claimed libraries. And, there is simply no suggestion to apply Kataoka to the systems of Campbell, Braithwaite and/or Takayama:

In addition to the specific remarks made above in support of the dependent claims, the Applicant respectfully asserts that the dependent claims are further allowable based on the allowability of the respective independent claims.

The undersigned has review the art made of record but not relied upon and believes it to of only background interest.

For the foregoing reasons, the claims are believed to be allowable and the Application is believed to be in condition for allowance. The Examiner is encouraged to contact the undersigned by telephone if a conversation would expedite prosecution of this case.

This constitutes a request for any needed extension of time. No fee is believed to be due in this instance. The undersigned hereby authorizes the charge of any deficiency of fees submitted herewith, or the credit of any overpayment, to deposit account number 09-0449.

Respectfully Submitted,

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cc: IBM - Tucson